

EXHIBIT F

Amie Gonzalez

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Tuesday, May 16, 2023 10:10 AM
To: Molshree Gupta
Cc: Maria L. Nixon; Patrick Stockalper; Amie Gonzalez
Subject: Re: Assiff v County of Los Angeles - MSJ meet and confer

Importance: High

Ms. Gupta:

Any discussion of dismissing claims or bringing an MSJ is painfully premature given Defendant's failure to provide discovery. The deposition of Defendant Kelly was 4/25. He failed to appear. The deposition of the PMK at COLA was 4/26. Again, no one appeared. I am still waiting on you to provide me with dates for the depositions of Sergeant Kelly and COLA on most of the issues specified. Once you comply with your discovery obligations, maybe we can revisit this issue. However, at the moment there is nothing to discuss.

Thomas M. Ferlauto

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On May 16, 2023, at 9:49 AM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Counsel:

Defendants will be moving for summary judgment based on opinions articulated by Mr. Gray (see Defendants' 5/10/23 report attached). It is also notable that Plaintiff's expert does not provide any opinions as to the lawfulness of Plaintiff's arrest or *Monell* liability (County/LASD custom, policy or practice).

Before we proceed with the MSJ, please advise whether Plaintiff is agreeable to a dismissal of the unlawful arrest and *Monell* claims; also, please advise re your availability for a telephonic conference today or tomorrow in anticipation of the prospective MSJ.

Thanks,

<image002.jpg>

Molshree Gupta

Partner

KJAR, McKENNA & STOCKALPER, LLP

From: Maria L. Nixon <mnixon@kmslegal.com>

Sent: Wednesday, May 10, 2023 4:33 PM

To: Thomas Ferlauto <tmf@lawofficetmf.com>; Patrick Stockalper <pstockalper@kmslegal.com>;

Molshree Gupta <mgupta@kmslegal.com>

Subject: RE: Assif v County of Los Angeles; Disclosure of Expert Testimony

Dear Counsel:

Attached please find our below documents in the above matter.

- Defendants' Expert Disclosures.

Thank you,

<image003.jpg>

Maria Nixon

Legal Assistant/Paralegal to

Molshree Gupta, Esq.

Carina M. Jordan, Esq.

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